

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO.

Plaintiff,

Original District No. 09CR510

v.

**ALLA LAOUGINE, aka
Alla Kashperko,
VENIAMIN LAOUGINE, and
YASSER ESKANDER,**

Case:2:10-mj-30014

Judge: Unassigned,

Filed: 01-14-2010 At 12:52 PM

REMOVAL ALLA LAOUGINE, ET AL (LCB)

DefendantS.

**GOVERNMENT'S PETITION
FOR TRANSFER OF DEFENDANT TO
ANOTHER DISTRICT AND SUPPORTING BRIEF**

Pursuant to Rule 5(c)(3)(D) of the Federal Rules of Criminal Procedure, the United States of America hereby petitions the Court for an order transferring defendants **ALLA LAOUGINE, aka Alla Kashperko, VENIAMIN LAOUGINE and YASSER ESKANDER** to answer to charges pending in another federal district, and states:

1. On **January 14, 2010**, defendants were arrested in the Eastern District of Michigan in connection with a federal arrest warrant issued in the **District of Nevada based on an Indictment**. Defendants are charged in that district with **Conspiracy to Induce Aliens to Come to, Enter, and Reside in the U.S., in violation of law for Commercial Advantage and Financial Gain, Conspiracy to Harbor Illegal Aliens for Commercial Advantage and Financial Gain**

2. Rule 5 requires this Court to determine whether defendants are the persons named in the arrest warrant and are entitled to a preliminary examination as described in Paragraph One above. See Fed. R. Crim. P. 5(c)(3)(D)(ii).

WHEREFORE, the government request this Court to conduct transfer proceedings in accordance with Rule 5 of the Federal Rules of Criminal Procedure.

Respectfully submitted,

BARBARA L. MCQUADE
United States Attorney

A handwritten signature in black ink, appearing to read "David Portelli", is written over the typed name.

DAVID PORTELLI
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Dated: January 14, 2010

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5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF NEVADA**

7 -oOo-

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 **ALLA LAOUGINE,**
12 a.k.a. Alla Kashperko,
13 **VENIAMIN LAOUGINE,** and
YASSER ESKANDER,

14 Defendants.

CRIMINAL INDICTMENT

2:09-CR- 510

15 VIOLATIONS:

8 U.S.C. §§ 1324(a)(1)(A)(iv), (v)(I) and
1324(a)(1)(B)(i) - Conspiracy to Induce
Aliens to Come to, Enter and Reside in
the United States, in Violation of Law, for
Commercial Advantage and Financial
Gain

8 U.S.C. §§ 1324(a)(1)(A)(iii), (v)(I) and
1324(a)(1)(B)(i) - Conspiracy to Harbor
Illegal Aliens for Commercial Advantage
and Financial Gain

16 THE GRAND JURY CHARGES THAT:

17 **COUNT ONE**

18 Conspiracy to Induce Aliens to Come to, Enter, and Reside in the United States, in
19 Violation of Law, for Commercial Advantage and Financial Gain

20 From a date unknown but not earlier than on or before October 12, 2007, and
21 continuing until on or after June 5, 2008, in the State and Federal District of Nevada, and
22 elsewhere,

23 **ALLA LAOUGINE,**
24 a.k.a. Alla Kashperko,
25 **VENIAMIN LAOUGINE,** and
26 **YASSER ESKANDER,**

defendants herein, did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with co-conspirator Kathy Nelson, and other persons known and unknown to the Grand Jury, to encourage and induce aliens, to wit: 1) A. Aleksic; 2) M. Cojbasic; 3) T. Badnjar; 4) B. Gajic; 5) S. Djordjevic; 6) M. Micic; 7) M. Tatarac; 8) M. Tintor; 9) Z. Vukcevic; 10) B. Stujanov; 11) D. Grubor; 12) J. Milanovic; 13) D. Stankovic; 14) A. Stojanovic; 15) N. Ivankovic; 16) M. Lazarevic; 17) M. Pandurov; 18) D. Zikic; 19) ZanXXX Simic; 20) ZveXXXXX Simic; 21) M. Barta; 22) D. Ziha; 23) P. Kominac; 24) D. Lucic; and 25) D. Cmiljanic; to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that their coming to, entry, and residing in the United States was in violation of law, for the defendants' own private financial gain and the financial gain of others.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv) 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i).

COUNT TWO

Conspiracy to Harbor Illegal Aliens for Commercial Advantage and Financial Gain

From a date unknown but not earlier than on or before October 12, 2007, and continuing until on or after June 5, 2008, in the State and Federal District of Nevada, and elsewhere,

**ALLA LAOUGINE,
a.k.a. Alla Kashperko,
VENIAMIN LAOUGINE, and
YASSER ESKANDER,**

defendants herein, knowing and in reckless disregard of the fact that aliens, to wit: 1) A. Aleksic; 2) M. Cojbasic; 3) T. Badnjar; 4) B. Gajic; 5) S. Djordjevic; 6) M. Micic; 7) M. Tatarac; 8) M. Tintor; 9) Z. Vukcevic; 10) B. Stujanov; 11) D. Grubor; 12) J. Milanovic;

1 13) D. Stankovic; 14) A. Stojanovic; 15) N. Ivankovic; 16) M. Lazarevic; 17) M. Pandurov;
2 18) D. Zikic; 19) ZanXXX Simic; 20) ZveXXXXX Simic; 21) M. Barta; 22) D. Ziha; 23) P.
3 Kominac; 24) D. Lucic; and 25) D. Cmiljanic; had come to, entered, and remained in the
4 United States in violation of law, did knowingly and intentionally combine, conspire,
5 confederate and agree together and with each other, and with co-conspirator Kathy Nelson,
6 and other persons known and unknown to the Grand Jury, to conceal, harbor and shield said
7 illegal aliens from detection, in various buildings, in and around the Detroit, Michigan area,
8 including but not limited to, various apartments at the Lexington Apartments in Southfield,
9 Michigan, and at the Charter Square Apartments in Troy, Michigan, for the defendants' own
10 private financial gain and the financial gain of others.

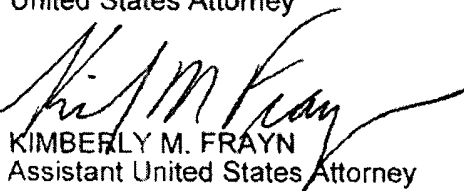
11 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii),
12 1342(a)(1)(A)(v)(I), 1324 (a)(1)(B)(1).

13 DATED: this 15 day of December 2009.

14 A TRUE BILL:

15
16 /S/
17 FOREPERSON OF THE GRAND JURY

18 DANIEL G. BOGDEN
19 United States Attorney

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21 KIMBERLY M. FRAYN
22 Assistant United States Attorney
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